



Douglas B. Lipsky

420 Lexington Avenue, Suite 1830  
New York, New York 10170-1830

Main: 212.392.4772

Direct: 212.444.1024

Fax: 212.444.1030

doug@lipskyllowe.com

www.lipskyllowe.com

October 30, 2024

VIA ECF

The Honorable Barbara C. Moses, U.S.M.J.  
U.S. District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Kerker v. BMDC Construction Limited, *et al.*,  
1:21-cv-09277 (PGG)(BCM)

---

Dear Magistrate Judge Moses:

This firm represents the Plaintiff. We submit this letter to respectfully remind the Court that Plaintiff's November 23, 2022 motion for a default judgment (Doc. No. 41-44) is still pending.

We appreciate the Court's time on this, as we fully recognize the Court has a heavy docket.

Respectfully Submitted,  
LIPSKY LOWE LLP

s/ Douglas B. Lipsky  
Douglas B. Lipsky